

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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TRI-CORP HOUSING, INC,

Plaintiff,

v.

Case No. 12-C-216

ROBERT BAUMAN, ALDERMAN

Defendant.

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**AFFIDAVIT OF JAMES HILL**

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STATE OF WISCONSIN     )  
                                      ) ss.:  
MILWAUKEE COUNTY     )

James Hill, being first duly sworn on oath, states as follows:

1.       At present I am the Vice President for Housing and Government Relations for the Milwaukee Center for Independence.

2.       Until October 14, 2007, I was Director of the Milwaukee County Behavioral Health Division. After that date, I functioned as Director of Housing at the Milwaukee County Department of Health and Human Services pending the formal creation of the position in the County's 2008 budget, effective January 1, 2008. My responsibilities as Director of Housing included the supervision and management of programs aimed at providing decent, safe, affordable and permanent housing for Milwaukee County residents with mental illnesses who were living in the community and who were receiving services through the Milwaukee County Behavioral Health system.

3. As a part of my responsibilities, prior to October 19, 2007, I had visited the property then known as West Samaria and then located in the 2700 block of West Richardson Place in Milwaukee, Wisconsin.

4. The living conditions that I observed at West Samaria convinced me that clients receiving services through our County Behavioral Health system should not continue to live at that location. Accordingly, I determined some time around October 19, 2007 that those individuals should be relocated.

5. I believed at that time that the living conditions at New Samaria were better than those existing at West Samaria.

6. For that reason, I determined that at that time the residents of New Samaria did not need to be relocated.

Dated at Milwaukee, Wisconsin this 26<sup>th</sup> day of February, 2013.

s/JAMES HILL

Subscribed and sworn to before me  
this 26<sup>th</sup> day of February, 2013.

s/ JUDITH A. WILLIAMS  
Notary Public, State of Wisconsin  
My commission 9-18-16

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